

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

<p>KIRA WAHLSTROM,</p> <p>Plaintiff,</p> <p>-against-</p> <p>DAVID J. HOEY, LAW OFFICES OF DAVID J. HOEY, P.C., DON C. KEENAN, D.C. KEENAN & ASSOCIATES, P.C. D/B/A THE KEENAN LAW FIRM, P.C., AND KEENAN’S KIDS FOUNDATION, INC.</p> <p>Defendants</p>	<p>Civil Case No. 1:22-cv-10792-RGS</p>
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**STIPULATION SEEKING REFERRAL TO ALTERNATIVE DISPUTE RESOLUTION
WITH MAGISTRATE JUDGE MARIANNE B. BOWLER**

Plaintiff Kira Wahlstrom and Defendants David J. Hoey, Law Offices of David J. Hoey, P.C. (“Hoey”) and Don C. Keenan, D.C. Keenan and Associates P.C. d/b/a The Keenan Law Firm P.C. (“Keenan”) submit this stipulation¹ seeking referral to Alternative Dispute Resolution with Magistrate Judge Marianne B. Bowler on the grounds stated herein.

1. As this Court has resolved all pending dispositive motions, the parties have agreed to attempt to reach an alternative resolution to this dispute before preparing for trial.

2. Wahlstrom and Hoey are already set for an ADR Hearing with Magistrate Judge Marianne B. Bowler on December 14, 2023 concerning Hoey’s attorney’s lien claim in *Wahlstrom v. Zurich American Insurance Company et al*, Case No. 1:19-cv-12208-LTS.

¹ As the claims against Defendant Keenan’s Kids Foundation have been resolved, they are not a party to this stipulation.

3. When counsel appeared for a telephonic conference this past July in *Wahlstrom v. Zurich*, Magistrate Judge Bowler raised the question of whether the parties might engage in a global mediation that included the present case.

4. The parties seek to participate in mediation in an attempt to reach a global resolution of their disputes and propose to join this case to the mediation already scheduled with Magistrate Judge Bowler in the *Zurich* case, if this can be accommodated by the Court.

Stipulated and agreed to by counsel on behalf of all parties this 8th of November, 2023.

On behalf of Plaintiff
Kira Wahlstrom

/s/ Bridget A. Zerner

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On behalf of Defendant Don C. Keenan and
D.C. Keenan and Associates P.C. d/b/a The
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/s/ John J. O'Connor

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On behalf of Defendants David J. Hoey and
Law Offices of David J. Hoey

/s/ Christine A. Knipper

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CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2023 this document was served by electronic delivery through the CM/ECF system on the registered participants as identified on the Notice of Electronic Filing, which will forward copies to Counsel of Record.

/s/ Bridget A. Zerner
Bridget A. Zerner